

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

LEILA GREEN LITTLE, JEANNE	§	Civil Action No. 1:22-cv-00424-RP
PURYEAR, KATHY KENNEDY,	§	
REBECCA JONES, RICHARD DAY,	§	
CYNTHIA WARING, AND DIANE	§	
MOSTER,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
LLANO COUNTY, RON CUNNINGHAM,	§	
in his official capacity as Llano County	§	
Judge, JERRY DON MOSS, in his official	§	
capacity as Llano County Commissioner,	§	
PETER JONES, in his official capacity as	§	
Llano County Commissioner, MIKE	§	
SANDOVAL, in his official capacity as	§	
Llano County Commissioner, LINDA	§	
RASCHKE, in her official capacity as Llano	§	
County Commissioner, AMBER MILUM,	§	
in her official capacity as Llano County	§	
Library System Director, BONNIE	§	
WALLACE, in her official capacity as	§	
Llano County Library Board Member,	§	
ROCHELLE WELLS, in her official	§	
capacity as Llano County Library Board	§	
Member, RHONDA SCHNEIDER, in her	§	
official capacity as Llano County Library	§	
Board Member, and GAY BASKIN, in her	§	
official capacity as Llano County Library	§	
Board Member,	§	
	§	
Defendants.	§	

**DECLARATION OF DIANE MOSTER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Diane Moster, declare:

1. I make this declaration based on personal knowledge. If called upon to testify, I could and would testify competently to the following facts.

2. I am a resident of Llano County and have been a patron of the library since moving here. I read many different types of books on a variety of topics, including fiction and nonfiction books, and books written for children, young adults, and adults. For example, I have often checked out books on subjects such as gardening, water coloring, food, and health. I also take my grandchildren to the public library when they are visiting to check out books and DVDs. I have always known what they are checking out and had no problems with the content.

3. I know that several books were removed from Llano County's physical library collection, including the following: (1) *Caste: The Origins of Our Discontent* by Isabel Wilkerson; (2) *They Called Themselves the K.K.K.: The Birth of an American Terrorist Group* by Susan Campbell Bartoletti; (3) *Spinning* by Tillie Walden; (4) *In the Night Kitchen* by Maurice Sendak; (5) *It's Perfectly Normal: Changing Bodies, Growing Up, Sex and Sexual Health* by Robie Harris; (6) a read-aloud picture book series including *My Butt is So Noisy!*, *I Broke My Butt!*, and *I Need a New Butt!* by Dawn McMillan; (7) a read-aloud picture book series including *Larry the Farting Leprechaun*, *Gary the Goose and His Gas on the Loose*, *Freddie the Farting Snowman*, and *Harvey the Heart Has Too Many Farts* by Jane Bexley; (8) *Being Jazz: My Life as a (Transgender) Teen* by Jazz Jennings; (9) *Shine* by Lauren Myracle; (10) *Gabi, a Girl in Pieces* by Isabel Quintero; and (11) *Freakboy* by Kristin Elizabeth Clark. I cannot check out these books because they are no longer on library shelves or in the Llano County library catalog. I would check out these books in the future if they were returned to library shelves.

4. I have also attempted to access OverDrive with my Llano County library card without success. I would use my library card to access ebooks and audiobooks on OverDrive in the future if access to OverDrive were reinstated. For example, I recently needed a book for a book club that was not available in the library but could have been checked out on Overdrive, had I had access to Overdrive. The book was available on Amazon for more than \$20.00 but I did not feel like I could spend that amount at the time.

5. Public libraries are and have long been an integral part of my life. The recent removal of books and termination of OverDrive has caused substantial damage. The atmosphere in Llano County's public libraries is just different now. I worry that those who work there are fearful for their jobs. The volunteers are low in number. To me, a library is a place of truth, knowledge, safety, and honesty. It should be a welcoming place for people of all kinds, colors, and personal orientations to seek knowledge and information. Up until now, I had taken public libraries for granted. I now see them as a gift and am willing to fight for the right of everyone to read what they choose without censorship.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: May 7, 2022

By:

DocuSigned by:  
*Diane Moster*  
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Diane Moster